



55 WEST MONROE STREET, SUITE 1200
CHICAGO, IL 60603-5127
TELEPHONE: 312-641-0060
FACSIMILE: 844-670-6009
<http://www.dickinsonwright.com>

PAUL A. DEL AGUILA
PDeLAguila@dickinsonwright.com
312-377-7862

May 6, 2025

VIA ECF

The Honorable Valerie Figueredo
Daniel Patrick Moynahan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Vinci Brands, LLC v. Coach Servs. Inc., et al., Civil Action No. 1:23-cv-05138
Vinci's Letter Motion to Seal Exhibit A to Letter Motion for Relief from Protective Order.

Dear Judge Figueredo:

Pursuant to Your Honor's Individual Rule I(g)(2), Vinci Brands LLC ("Vinci") respectfully requests Your Honor's approval to provisionally seal Exhibit A to Vinci's Letter Motion for Relief from Protective Order.

In ruling on a motion to seal, Your Honor must consider "the privacy interests of those resisting disclosure." *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006) (quoting *United States v. Amodeo*, 71 F.3d 1044, 1050 (2d Cir. 1995)). On February 7, 2024, this Court so ordered a stipulation and confidentiality agreement ("Protective Order"). Pursuant to the Protective Order, parties may mark documents produced in discovery and deposition transcripts as "Confidential" and "Highly Confidential – Attorney's Eyes Only."

On April 24, 2024, Vinci took the deposition of Case-Mate, Inc. employee, Kristen Roney. Case-Mate has designated portions of Ms. Roney's deposition transcript as Confidential. Exhibit A to Vinci's Letter Motion for Relief from Protective Order contains two pages that have been designated as Confidential. Pursuant to the protections set forth in the Protective Order, Vinci requests that Exhibit A be provisionally sealed until Case-Mate has an opportunity to move to seal. Accordingly, Vinci has filed an unredacted copy of Exhibit A under seal pending further Order from the Court.

Hon. Valerie Figueredo
May 6, 2025
Page 2

DICKINSON WRIGHT PLLC

Respectfully submitted,

/s/ Paul A. Del Aguila
Paul A. Del Aguila
Counsel for Vinci Brands LLC

cc: All Counsel of Record

MEMO ENDORSED



**HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE**

Dated: 5/7/25

The motion for a provisional seal is GRANTED. If Case-Mate, Inc. seeks to permanently seal the document referenced herein, Case-Mate, Inc. is directed to make a showing under Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110 (2d Cir. 2006) by May 17, 2025. The Clerk of Court is directed to maintain the viewing restrictions at ECF No. 818 and terminate the motion at ECF No. 817.